## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

Criminal No. 04-10390-WGY

v.

MICHAEL AMBERS

## <u>DEFENDANT MICHAEL AMBERS' MOTION FOR CHANGE IN</u> <u>SCHEDULING ORDER</u>

Now comes court appointed counsel for Michael Ambers who requests a one month continuance in the scheduled date for substantive motions from May 9, 2005 to a new date of June 9, 2005 and for a change in the trial date from June 13<sup>th</sup> to July 13, 2005; all for the reason that appointed counsel has been notified by a personal telephone call from retained replacement counsel's secretary on 4/28/05 and from a voice mail message from retained replacement counsel on 4/29/05 that the undersigned is being replaced by retained counsel Frank Camera, Esq., 56 North Main Street, Fall River, Massachusetts 02720, telephone (508) 677-2878.

This Motion is filed in order to provide some lead time for replacement counsel to review the extensive files in this case and to discuss with his new client and to make important tactical and strategic decisions with him regarding substantive motions and possible plea considerations..

Respectfully submitted,
/s/ John Wall
John Wall, Esq.
BBO#513300
One Commercial Wharf West
Boston, MA 02110
617-742-9096

Dated April 30, 2005

## CERTIFICATE OF SERVICE

I, John Wall, hereby certify that on April 28, 2005, I forwarded a copy of this Motion to Christopher F. Bator, AUSA, replacement counsel Frank Camera, Esq. and to Michael Ambers.

/s/John Wall

John Wall